



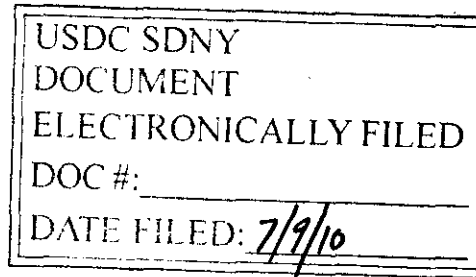
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June 24, 2010

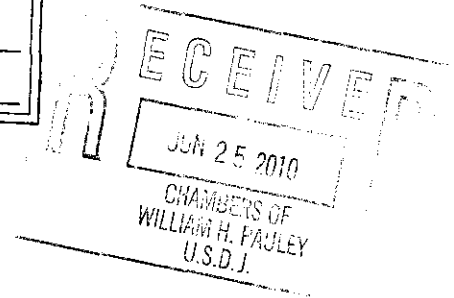
VIA FEDEX

Hon. William H. Pauley
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2210
New York, New York 10007



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CLIENT/MATTER NUMBER
093033-6000



Re: *BroadVision, Inc. v. General Electric Co., et al.*
Case No. 08-CV-1478 (WHP)

Dear Judge Pauley :

We represent Defendant The Medical Protective Company ("MedPro") in the above-referenced matter. We submit this letter requesting an extension of time according to your Individual Practice Rule 1(E).

On May 6, 2010, MedPro filed a motion for summary judgment, which if granted, would resolve all claims in this action except for Plaintiff BroadVision, Inc.'s ("BV") claim for breach of the MedPro MLA. A hearing on the motion is scheduled for July 9, 2010. On June 8, 2010, BV served its First Set of Interrogatories and Second Set of Request For Production of Documents (collectively, the "Discovery Requests"), the majority of which seek information related to matters currently the subject of MedPro's summary judgment motion. MedPro's responses presently are due on July 12, 2010, and no prior requests for extensions to respond have been made.

Responding to the Discovery Requests would be expensive and time-consuming, and ultimately unnecessary if MedPro's motion is granted. Accordingly, MedPro requested that BV stay the Discovery Requests until such time as the Court rules on the pending summary judgment motion. BV refused this request. In an attempt to compromise, MedPro requested that BV agree that until the motion is ruled upon, MedPro is obligated only to answer the Discovery Requests related to the breach of the MedPro MLA—the only issue MedPro did not address in its pending summary judgment motion. BV refused this request as well saying doing so could affect its ability to complete discovery.

Because BV was unwilling to reach a compromise, MedPro now requests that the Court stay discovery related to issues covered by the summary judgment motion until thirty (30) days after it rules on the motion. MedPro has no objection to extending the discovery cut-off period in this case for a corresponding period of time. MedPro further requests that it be granted a ten (10) day enlargement of time to and including July 22, 2010, to respond to the Discovery

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Requests related to the alleged breach of the MedPro MLA due primarily to the travel schedule of counsel for MedPro and to provide adequate time to prepare the applicable responses.

Respectfully submitted,

Robert S. Weisbein
Robert S. Weisbein

RSW:mam

cc: L. Donald Prutzman, Esq. (via FedEx)
J. Joseph Tanner, Esq.

Application Granted

SO ORDERED:

William H. Pauley

WILLIAM H. PAULEY III U.S.D.J.
7/8/10